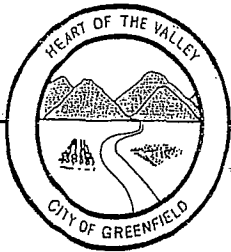


## **Exhibit G**



# City of Greenfield

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October 31, 2006

Bob Schubert, AICP  
Acting Building and Planning Services Manager  
COUNTY OF MONTEREY RESOURCE MANAGEMENT AGENCY  
168 W. Alisal Street, 2<sup>nd</sup> Floor  
Salinas, CA 93901

LAFCO  
NOV 01 2006

## Subject: City of Greenfield Sphere of Influence Update

Dear Bob:

Thank you for compiling comments on the City of Greenfield's proposed SOI boundary from the County's various land use agencies. We are confident that our joint meeting of October 17, 2006, the County's consolidated comments, and the City of Greenfield's written responses to those comments within this letter will form the basis of a city/county "agreement" as discussed in Section 56425(b) of the Government Code.

As you are aware, that section of the Cortese Knox Hertzberg Act of 2000 requires a meeting "between" City and County representatives to attempt to "reach agreement" regarding the proposed boundary, development standards and zoning within the SOI that will promote logical and orderly development. Such an agreement is not required to move the proposed SOI forward for Commission consideration. However, the intent of the city/county discussions is to provide the Commission with greater assurance that the land use agencies most affected by the boundary expansion have discussed and addressed fundamental planning and growth issues.

In that context, the City of Greenfield has the following responses to the County's comments on the proposed SOI boundary:

### General Comments

Concentric Development? The County is correct that the City of Greenfield is surrounded by prime agricultural land, and the City's growth will impact agricultural resources regardless of the direction of growth. The City has carefully weighed the amount and direction of future growth within its General Plan Update process, based on a number of considerations including public input, physical and environmental constraints, infrastructure planning and engineering, and existing land uses and patterns. Please be advised that the City adopted its General Plan and certified the corresponding EIR in May 2005. The documents were circulated to LAFCO, the County of Monterey and other

public and private entities. The same fundamental plan was presented to LAFCO in 2003 in a workshop setting. At that time, the Commission informally reviewed the City's proposed boundary and identified 2<sup>nd</sup> Street as an agricultural "line in the sand" to limit growth and conversion of farmland to the east. The City has respected that advice, which is reflected within the current SOI proposal and General Plan. In addition, the City removed 172 acres of prime agricultural land planned for industrial use in the City's southeast corner. Removal of this land from the SOI, known to be some of the most productive and highest quality in the area, is in direct response to LAFCO concerns.

The City has worked extensively to limit the size of its overall development "footprint" by incorporating higher density land uses within the General Plan to achieve its land use goals. In addition, the Artisan Agriculture/Visitor Serving (AAVS) designation is an extremely low-intensity use that is compatible with agriculture and serves as an agricultural transition area to the north.

In summary, the City completed its public review obligations on the proposed SOI boundary, and prepared and approved its General Plan in accordance with State law. The basic growth pattern and SOI boundary has been in the public realm for review and discussion since 2003, and is the product of a sound public planning process and physical factors. The City has based its General Plan and SOI on extensive public input in an open and transparent process, and has made boundary adjustments in direct response to LAFCO and public concerns over time. The City has taken significant steps to respect continued agriculture around the City and to limit the amount of conversion needed for the City's growth through strong land use and planning policies.

#### **Agricultural Commissioner**

Buffering Policies? The Commissioner is correct that the City has adopted significant physical buffers on the east side of the SOI boundary, and has effectively used the AAVS designation and strong policies to provide adequate buffers city-wide.

#### **Planning Department**

Agricultural Buffer Zones? Please see above responses. The City has established a 200 foot buffer on the east side of the SOI boundary, which the City has required to be maintained and fully landscaped. At least two projects along 2<sup>nd</sup> Street are indicative of the success of those policies. The west side of the City contains mostly vineyard uses. City policy on the western edge is responsive to the type and intensity of agriculture in these areas, and allows for roadways and other methods of physical separation between land uses to serve as buffers. The City has found that these buffering methods are effective and appropriate on the western edge, but at the same time do not permanently "lock out" the potential for growth beyond the current 20-year General Plan.

Financial Loss to the County? The County's comment regarding financial impacts assumes that City growth will result in a "financial loss" to the County and/or region due to agricultural land conversion. First, a fiscal impact analysis is not required, nor

customary, in the review of an amendment to a City's SOI boundary. Second, the City's General Plan includes significant job growth in the area and a greatly improved jobs/housing balance. The City anticipates that new industrial, retail and office/professional uses will actually provide a significant economic stimulus for the City and surrounding unincorporated areas, and provide opportunities for jobs that are higher paying than the majority of jobs provided by agriculture. Lastly, and perhaps most importantly, all annexations require a tax sharing agreement between the City and County. These agreements are designed to ensure equity between agencies as the tax base expands. For these reasons, there is no need to further quantify fiscal changes.

Alternatives to Conversion? The City has adopted policies within the General Plan to concentrate growth in a logical manner around the City center. The General Plan contains a significant amount of mixed use and medium density residential land, which allows up to 15 units per acre. The City has therefore adopted a plan that concentrates growth to limit the size of the City's future development "footprint". The City's proposed SOI is coterminous with its General Plan boundary. The boundary reflects a conscious decision on the part of the City Council to plan only for the needs of the next 20 years, and not take in more land than needed.

With the creation of the AAVS land use, nearly half of the City's "future growth" area is within a designation that allows only 5% development coverage. This land use significantly limits the amount of land that will be converted for urban development. The AAVS land use is designed to encourage ag-related, low intensity uses and continued agricultural viability on those lands. The City of Greenfield completed a thorough review of land use alternatives as part of the General Plan process, which resulted in the proposed boundaries and preservation methods. The City has consciously avoided incorporation of Williamson Act lands into the SOI. At the southern end of the City, where Williamson Act lands were included as part of the South End SOI project, the City supported the applicant's Williamson Act Exchange Program which significantly added permanently preserved prime farmland acreage to the region. The City Council found that the approach of concentrating development through higher densities is the most effective method of preservation in Greenfield because the City is not surrounded by large, cohesive tracts of land where permanent easements could be negotiated with a single large project or single land owner. The City has been proactive and responsible in planning its future impacts on agriculture, as evidenced in the findings for the General Plan.

#### Public Works Department

Service Levels on Existing Facilities? The City of Greenfield's General Plan is linked to a series of facility programs addressing water, sewer, roadways, drainage, police, fire, emergency response and other public service resources. The General Plan contains strong policies requiring development to "pay as you go" through updated development impact fees. The City has taken significant steps to be self-reliant and to limit its impact on County service systems.

Impacts on the County Road System? The traffic impact analysis prepared in support of the City's Circulation Element analyzed the impact of General Plan buildout upon all primary intersections and roadway segments within the proposed SOI boundaries. The roadway system has been planned to mitigate new trip generation through the identification of new and expanded facility improvements. Over \$90 million in improvements have been identified to accommodate the increase in traffic flows.

All facilities have been planned to maintain acceptable levels of service on the local system. Beyond the City's planned roadway system and SOI, some traffic trips would be expected to find their way onto County roads. However, the existing levels of service on rural roads surrounding Greenfield remains very good, and is anticipated to remain that way into the foreseeable future. Based on the traffic impact analysis, it is nearly inconceivable that the few trips generated within the City that would utilize rural county roads would trigger a Level of Service (LOS) significance threshold. The City's roadway system has been designed to route traffic trips to improved ramp intersections and new interchanges along Highway 101, which will minimize the distribution potential on the outlying network. As the County is aware, the LOS on a particular roadway or intersection would have to be degraded to LOS D or worse to have a significant impact on a County road requiring mitigation. The traffic volumes and distribution pattern in the traffic impact analysis do not support evidence that such an impact would occur.

As the General Plan EIR was certified in May 2005, the County, TAMC and Caltrans have had multiple opportunities to review and consult on the City's transportation program. City staff have met with Caltrans and TAMC on multiple occasions to discuss regional transportation issues and the City's planned improvements.

Continued Coordination and Review? The City agrees that coordination with the County and other affected agencies is critical in the continued growth of the City with regard to roadway facility improvements. New development is required to fund new improvements as levels of service warrant. The CEQA review process will also provide the County opportunities to review and comment on specific projects that will trigger the need for new or improved facilities.

With regard to the South End SOI project that makes up the southern boundary of the proposed SOI, the City did identify the need for several improvements to the network, including the potential for a new interchange south of Espinosa Road. These plans have been reviewed and commented upon by Caltrans and TAMC, and clearly will need to be coordinated with Caltrans through planning, design and permitting at such time as the facilities are needed.

Extension of 3<sup>rd</sup> Street? County support of the 3<sup>rd</sup> Street roadway extension to serve the local network is noted.

South End Truck Traffic? The County notes that commercial and industrial land uses at the south end of the City may impact County roads. A comprehensive traffic impact analysis for the South End SOI was prepared as part of the EIR for that project. The

project is still at the conceptual level, and will require additional planning and analysis when the property is proposed for annexation into the City and when a specific development project is proposed. Additional detail regarding project-specific effects will be assessed as part of the review of such proposals, and any such review would be expected to analyze truck traffic volumes and traffic patterns in the area.

12<sup>th</sup> Street Plan Line? Information regarding the plan line along 12<sup>th</sup> Street is appreciated. Any proposal for annexation of property along this section of 12<sup>th</sup> Street must address the disposition of the line as part of the application process.

Consistency with Regional Planning Documents? The City of Greenfield analyzed the General Plan and conducted a traffic impact analysis to develop a list of needed improvements. The City contends that the improvements identified are substantially consistent with regional plans, but provide additional detail with respect to specific facility needs.

Cumulative Regional Impacts? The City of Greenfield has had several discussions with TAMC regarding regional impacts and the proposed Regional Impact Fee. At this time, we understand that there is no adopted fee in effect, and that TAMC is revising its list of regional improvements and using that information to calculate an updated proposed fee. The County is correct that the City recently adopted a notice of intent to adopt a regional fee once updated information is available for review.

## **Health Department**

Capital Improvement Plans/Infrastructure Financing. The County is correct that the City has been continually updating its infrastructure plans and adjusting impact fees accordingly. The cost of infrastructure upgrades, such as those underway for water and sewer facilities, will be borne by new development. It is the City's policy to allow construction only if capacity within the systems is available.

## **Conclusion**

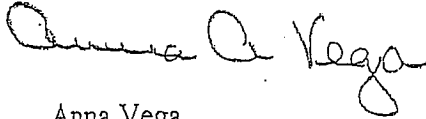
Based upon the City's review of the County's comments on the SOI proposal, it is clear that the primary issues of the County include general direction of growth, agricultural land and buffering, and continued coordination toward implementing public service systems, particularly roadways. As outlined in this letter, the City of Greenfield has either planned for, mitigated, or otherwise addressed these issues at the planning and policy level. The City's General Plan, and corresponding SOI boundary, reflect planning boundaries that have considered several opportunities and constraints, as well as competing interests.

As we see no significant issues remaining that should cause protest on the part of the County, we respectfully request that the County consider the City's responses, agree to the proposed boundary, and forward that conclusion to LAFCO Monterey County so that the City's application may be deemed complete.

Thank you for your assistance in this process.

Sincerely,

CITY OF GREENFIELD

A handwritten signature in dark ink, appearing to read "Anna Vega". The signature is fluid and cursive, with the first name "Anna" and last name "Vega" clearly distinguishable.

Anna Vega  
City Manager

Cc: Mayor and City Council, City of Greenfield  
Thom McCue, LAFCO Monterey County  
Kate McKenna, LAFCO Monterey County  
Wayne Tanda, Monterey County RMA  
Nick Chiulos, Monterey County RMA  
Mike Novo, Monterey County RMA  
Mark McClain, City of Greenfield  
April Wooden, City of Greenfield  
Bob Roach, Monterey County  
Ron Lundquest, Monterey County  
Len Foster, Monterey County  
Lynn Burgess, Monterey County  
Tad Stearn, PMC  
Michael McCormick, PMC